



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

FEB 19 2016

REPLY TO THE ATTENTION OF

WC-15J

CERTIFIED MAIL 7009 1680 0000 7669 4131
RETURN RECEIPT REQUESTED

Richard Williams
Imperial Marble Corporation
327 East LaSalle Street
Somonauk, Illinois 60552

Subject: May 13, 2014 CWA Compliance Evaluation Inspection

Dear Mr. Williams:

Enclosed, please find a copy of the U.S. Environmental Protection Agency Clean Water Act Inspection Report for the Industrial Storm Water inspection conducted at the Imperial Marble Corporation facility on May 13th and May 14th 2014. The purpose of the inspection was to evaluate and document compliance of Imperial Marble Corporation's facility with the Clean Water Act.

Imperial Marble Corporation falls under the SIC code 3089 (Rubber and miscellaneous plastic products). Federal regulations at 40 CFR 122.26(b)(14)(i)-(xi) require storm water discharges associated with this category of industrial activity to be covered under NPDES permits. Imperial Marble Corporation is covered under Illinois National Pollutant Discharge Elimination System Permit ILR006856. Under the permit, Imperial Marble Corporation has a requirement to develop and implement a Storm Water Pollution Prevention Plan (SWPPP). At the time of the inspection, it was found that Imperial Marble Corporation had failed to properly implement their SWPPP. Specifically, Imperial Marble Corporation had failed to conduct and document required self-inspections and sampling, failed to provide employees with SWPPP training, and had failed to implement best management practices identified in the SWPPP.

Since the inspection, Imperial Marble Corporation has stated and provided documentation to show that the deficiencies in the implementation of the SWPPP have been corrected.

Please be aware that properly maintaining and implementing the SWPPP is a condition of your Illinois National Pollutant Discharge Elimination System permit. Failure to maintain and implement the SWPPP may subject Imperial Marble Corporation to further enforcement action pursuant to Section 309 of the Clean Water Act (CWA).

Should you find anything in the report that you disagree with, please provide a detailed response within thirty (30) calendar days.

Thank you for your prompt attention to this matter. If you have any questions, please contact Ben Atkinson of my staff at (312) 353-8243.

Sincerely,

A handwritten signature in dark ink, appearing to read 'RJB', with a long horizontal flourish extending to the right.

Ryan J. Bahr, Chief, Section 2
Water Enforcement and Compliance Assurance Branch

Enclosures

cc: Roger Callaway, IEPA

**CWA COMPLIANCE EVALUATION INSPECTION REPORT
U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

Purpose: CWA Compliance Evaluation Inspection

Facility: Imperial Marble Corporation
327 East LaSalle Street
Somonauk, Illinois 60552
41.630716, -88.678245

NPDES Permit Number: ILR006856 (expired)

Date of Inspection: 5/13/2014 – 5/14/2014

EPA Representatives:

Ben Atkinson, Agronomist, 312-353-8243, atkinson.ben@epa.gov

William Jones, Environmental Engineer, 312-886-6058, jones.william@epa.gov

**EPA Representatives present but not part of CWA Compliance Evaluation
Inspection**

Cher Benisek, Geologist

Bob Smith, Environmental Scientist,

Maynard Shaw, Chemical Engineer (retired)

State Representatives: None

Facility Representatives:

Richard Williams, President

Chad Cartwright, Plant Manager, Safety and Environmental Enforcement

Conestoga-Rovers & Associates (Environmental Contractors)

Steven Bavetz

Tom Beeching

Report Prepared by: Ben Atkinson, Agronomist

Report Date: 1/26/2016

Inspector Signature



1. BACKGROUND

The purpose of this report is to describe, evaluate and document Imperial Marble Corporation's (IMC) compliance with sections 301 and 402 of the Clean Water Act (CWA) at its Somonauk, Illinois facility (Facility) at the time of the May 13, 2014 multi-media inspection (the Inspection). The Inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended.

IMC submitted a complete Notice of Intent (NOI) for the Facility to be covered under the Illinois Environmental Protection Agency's (IEPA) National Pollutant Discharge Elimination System (NPDES) general permit to discharge storm water associated with industrial activity on April 19, 2001. IEPA determined that storm water discharges associated with the Facility were appropriately covered by the general permit on May 3, 2001. The permit number was ILR006023.

In January 2005, IMC submitted a No Exposure Certification for Exclusion from NPDES Storm Water Permitting. IEPA determined that the Facility was not required to obtain an NPDES storm water permit and terminated permit number ILR006023 on January 12, 2005.

In September 2009, IMC determined that there were areas on the Facility which had the potential for storm water exposure and submitted a new NOI. IEPA determined that storm water discharges associated with the Facility were appropriately covered by the general permit on November 13, 2009. The permit number is ILR006856.

The general permit to discharge storm water associated with industrial activity expired on April 30, 2014. IMC reapplied for coverage on May 9, 2014. A revised permit is presently being developed by IEPA.

The Facility is comprised of the main plant, an out building, outdoor storage areas, and a storm water retention pond (see Map Appendix A).

IMC manufactures synthetic marble bath surfaces for commercial and residential construction outlets. In their process, they use calcium carbonate, polyester resin, polyester gel coat, a peroxide initiator, fillers, and pigments. At the time of the inspection, all manufacturing by-products are recycled with the exception of polymerized scrap marble. IMC was working on a process to recycle the polymerized scrap marble into a product as well.

The calcium carbonate is received in shipping totes and the liquid raw materials are received in sealed totes and drums. All raw materials are stored indoors to prevent storm water contact.

A revised Storm Water Pollution Prevention Plan was developed and submitted to IEPA in May 2014.

2. SITE INSPECTION

Entry was made and credentials were presented to Richard Williams, President, at the IMC Facility at 8:08 A.M. on May 13, 2014. EPA left the site at 3:20 P.M. On May 14, 2014, EPA entered the Facility at 8:00 AM. EPA left the site at 12:30 P.M.

On May 13, 2014, it was approximately 58° Fahrenheit and overcast with occasional precipitation. On May 14, 2014 it was approximately 51° Fahrenheit and overcast with no precipitation.

On May 13, 2014, following introductions, an initial file review, and an inspection of the interior of the facility, EPA began the walk around of the exterior portions of the facility. The facility handles the bulk of its storm water using 5 storm water drains which outlet to a storm water retention pond located south of facility (see Map Appendix A).

Note: A full photo log is attached. The time stamp on the camera was not functioning so photo times have been left off.

I observed the parking area on the east side of the facility (Photo P1010245) as well as the resin unloading area (Photo 1010241). The very north end of the driveway and parking area appeared to drain to the north to the roadside ditch while the remainder of the Facility's storm water flowed to the Facility's storm water collection drains.



P1010245 Description: Parking area east of main plant. Out building in distance.
Location: North end of parking area. Direction: Facing south.



P1010241 Description: Resin unloading area on the north end of the main plant.
Location: North end of property. Direction: Facing west.

I observed a storm water drain and tile riser for the adjacent field located to the east of the parking area in the grassed area (photo P1010247).



P1010247 Description: Storm water drain in grassed area east of parking area.
Location: East of parking area. Direction: Facing east.

I observed a storm water drain covered by a grate and wire mesh located next to the loading dock on the east side of the main plant (photos P1010249 and P1010250).



P1010249 Description: Storm water drain in east side loading dock.
 Location: Loading dock on east side of main plant. Direction: Facing down.
 Date: 5/13/2014



P1010250 Description: Storm water drain in east side loading dock.
 Location: Loading dock on east side of main plant. Direction: Facing west.
 Date: 5/13/2014

On the southeast corner of the facility, I observed an out building used to store raw materials (Photo P1010305, P101306). I observed a drain in the concrete pad on the north side of the out building. This drain's outlet is located immediately to the east of the pad. There was some track out visible on the north side of the out building (Photo

P101307). Storm water from this are flows to the storm drain on the east side of the parking area.



P1010305 Description: Raw materials stored in out building. Note material on ground with potential to cause track out and storm water contamination. Location: Out building. Direction: South. Date: 5/14/2014



P1010306 Description: Raw materials stored in out building. Note material on ground with potential to cause track out and storm water contamination. Location: Out building. Direction: North. Date: 5/14/2014



P1010307 Description: Concrete pad on north side of out building. Note slight track out and drain set in pad. Location: Northside of out building. Direction: South.
Date: 5/14/2014

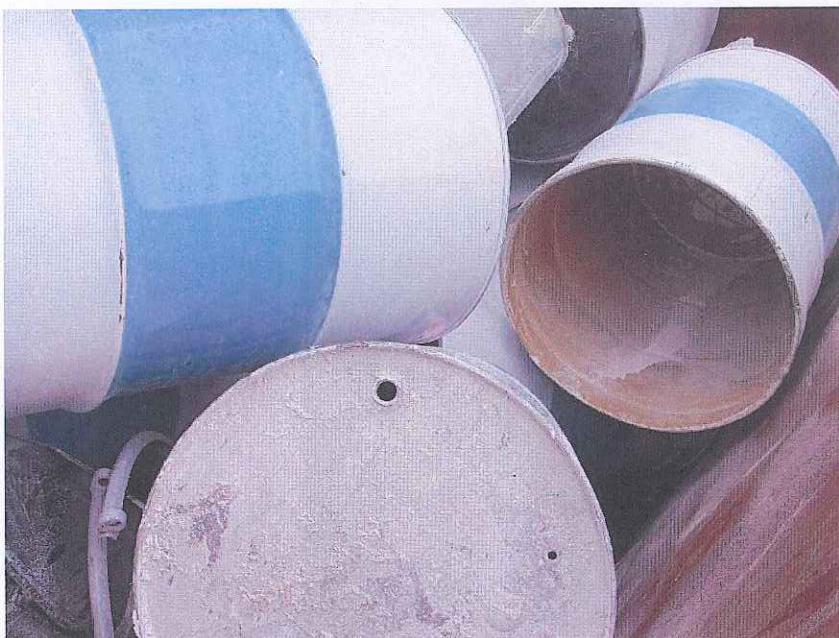
I observed an outdoor storage area on the south side of the main plant (Photo P1010257). I observed a white residue on the ground around the outdoor storage area. This area drained to the south. There was a roll-off dumpster filled with used barrels located south of the main plant and west of the out building (Photo P1010264). I observed that the bottom of the dumpster was rusted through and that there was the potential for precipitation to come in contact with the contents of the dumpster and then flow to the storm drain located in the grassed area south of the main plant (photos P1010265, P10267, P1010260, P1010258).



P1010257 Description: Outdoor storage area on south end of main plant.
Location: Southeast corner of main plant. Direction: Facing west. Date: 5/13/2014



P1010264 Description: Roll off dumpster with empty barrels.
Location: West of out building. Direction: Northwest. Date: 5/13/2014



P1010267 Description: Roll off dumpster with empty barrels.
Location: West of out building. Direction: Northwest.

Date: 5/13/2014



P1010265 Description: Holes rusted through bottom of roll off dumpster.
Location: West of out building. Direction: NA

Date: 5/13/2014



P1010260 Description: Storm water drain south of main plant.
 Location: South of main plant. Direction: Facing south. Date: 5/13/2014



P1010258 Description: Storm water drain south of main plant.
 Location: South of main plant. Direction: Facing down. Date: 5/13/2014

I observed a storm water drain located in the grassed area southeast of the main plant (photo 1010280). This storm water drain appeared to collect the storm water from the swale on the west side of the facility (photo P1010282).



P1010280 Description: Storm water drain with gravel surrounding it.
 Location: Southwest side of main plant in grassed swale. Direction: West
 Date: 5/13/2014



P1010282 Description: Grassed storm water swale on west side of main plant.
 Location: Southwest of main plant. Direction: North. Date: 5/13/2014

I observed a storm water drain located in the loading dock on the west side of the facility (photo P1010291, P1010286).



P1010291 Description: West side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014



Description: Storm water drain in west side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014

I observed a pile of waste stone from the time when IMC also cut natural stone bath surfaces (photo P1010292).



P1010292 Description: Pile of discarded natural stone from time when IMC manufactured cut stone bath surfaces. Location: Southwest of main plant.
Direction: South. Date: 5/13/2014

I walked to the outlet of the storm water drains located at the storm water retention pond south of the facility (Photo P1010294, P1010295, and P1010296). I observed an off-white foam on the surface of the water immediately at the outlet (Photo P1010297).



P1010294 Description: Outfall of storm water collection system.
Location: East side of storm water retention pond. Direction: North.
Date: 5/13/2014



P1010295 Description: Outfall of storm water collection system. Location: East side of storm water retention pond. Direction: Northeast. Date: 5/13/2014



P1010296 Description: Storm water retention pond. Location: East end of storm water retention pond. Direction: West. Date: 5/13/2014

I walked around the storm water retention pond and found that the pond appeared to be located at the low point of a bowl feature with no outlet to surface waters.

On the second day of the inspection, 5/14/2014, I walked on the west side of the main plant from north to south. I observed the grassed storm water swale located west of the main plant (photo P1010303).



P1010303 Description: Grass swale on west side of main plant.
Location: Northwest side of main plant. Direction: South. Date: 5/14/2014

3. Document Review

The permit (ILR006856) took effect on November 13, 2009. It expired on April 30, 2014. IMC reapplied for coverage on May 9, 2014. A revised permit is presently being developed by IEPA. One of the permit requirements is for IMC to prepare and implement a SWPPP. SWPPP requirements are set forth in Section E of the permit. Non-storm water discharges are not covered by this permit.

I received a copy of the SWPPP during the inspection. During the inspection, additional SWPPP documents were requested including all records and reports required to be kept in accordance with the SWPPP and the permit.

4. Areas of Concern

- 1) Generally, IMC had failed to conduct any required inspections since mid-2011. Specifically:
 - a. At the time of the inspection, IMC had failed to do their required annual site inspection for 2012 and 2013.

- b. At the time of the inspection, IMC had failed to do their required quarterly observations of event discharges since the second quarter of 2011.
 - c. At the time of the inspection, IMC had failed to do monthly inspections since July, 2011.
- 2) Sampling done for the quarterly observations of event discharges, prior to their cessation in 2011, had been done at the storm water drains instead of the outlet as required by the SWPPP.
 - 3) The SWPPP requires that IMC employees receive training on the goals and components of the SWPPP. At the time of the inspection, IMC did not include SWPPP training in their annual training.
 - 4) A source of potential storm water contamination observed during the inspection was from non-covered dumpsters. The SWPPP states that "Covers or tarps for the dumpsters will be investigated and options for enclosure will be evaluated." There was no evidence that this investigation was completed.
 - 5) A source of potential storm water contamination observed during the inspection was the outdoor storage area. The SWPPP states that "Whenever possible, any scrap steel, metal drums, and miscellaneous metal parts will be stored under structures to prevent extended contact with storm water runoff."

5. Post-Inspection Response

On January 22, 2016, I spoke with Mr. Chad Cartwright, Plant Manager. Mr. Cartwright informed me that since the inspection IMC has resumed all monthly, quarterly, and annual inspection. Mr. Cartwright sent me that last three months of inspection reports. Mr. Cartwright also stated that for the sampling requirement of the quarterly observations of event discharges, IMC has sampled at the outfall of the storm water collection system. Mr. Cartwright provided copies of the last three quarterly sampling. Additionally Mr. Cartwright informed me that they had added SWPPP training to the employee's annual training. Mr. Cartwright stated that IMC has moved as much of the equipment that was stored in the outdoor storage area to indoor storage areas or under cover as possible. He also stated that IMC has put covers over all dumpster.

6. Conclusion

No unpermitted discharges were identified during the site inspection. Full implementation of the current SWPPP will help to mitigate storm water contamination and runoff from IMC. Correct inspection, sampling, training, and housekeeping practices need to be done in accordance with the SWPPP.

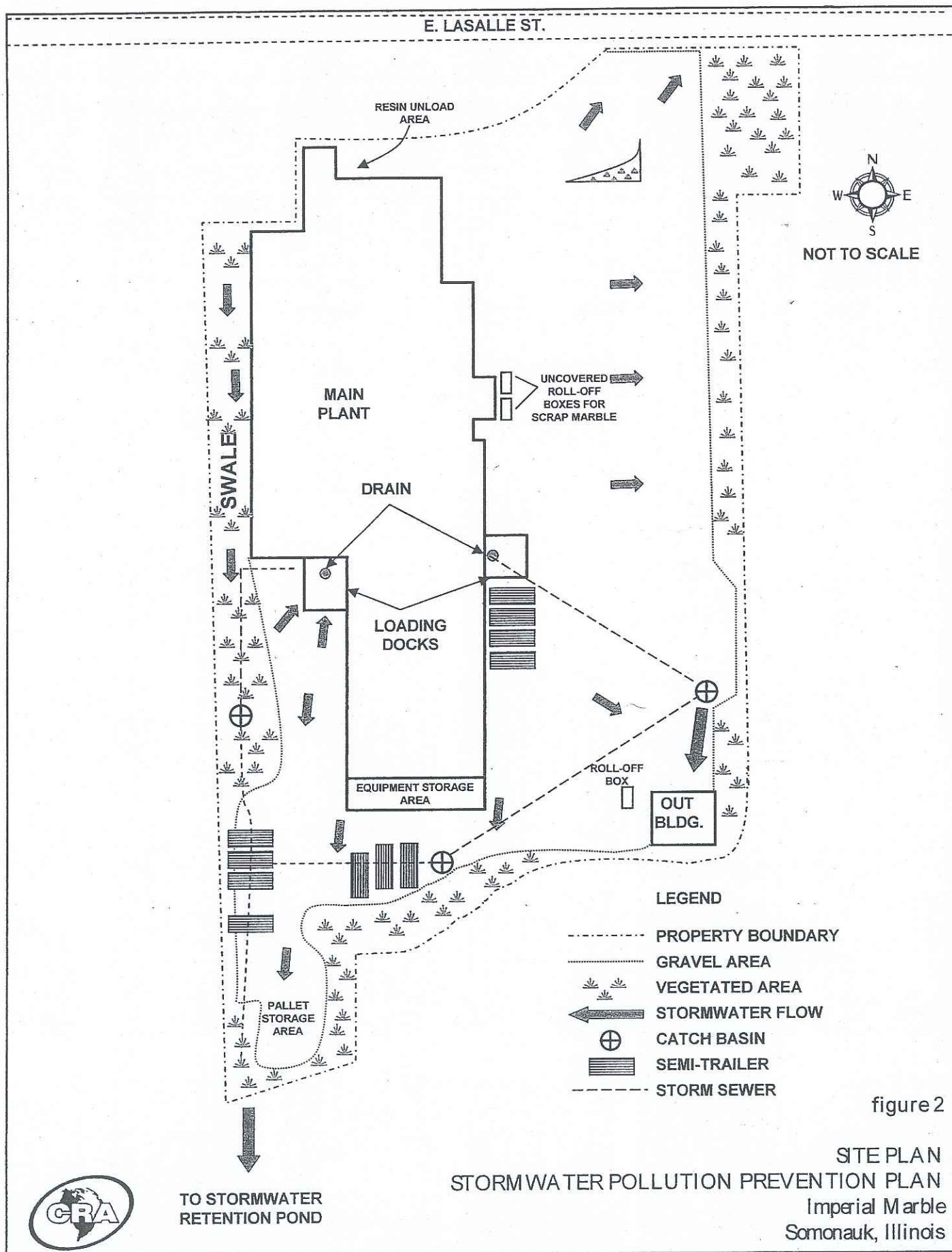
7. Documents Received

1. Imperial Marble Corporation – Description of facility and operations
May 2014
2. Imperial Marble Corporation SWPPP
3. 2014 NOI
4. Product Stewardship Manual
5. August 2009 – July 2010 annual facility inspection report
6. July 2010 - July 2011 annual facility inspection report
7. May 2013 – May 2014 annual facility inspection report
8. September 2009 – July 2011 monthly inspection reports
9. 2009 3rd and 4th quarter inspection reports
10. 2010 quarterly inspection reports
11. 2011 1st and 2nd quarter inspection reports
12. October – December 2015 monthly inspection reports
13. 2015 2nd, 3rd, and 4th quarter inspection reports.

Appendixes

- A) Site Map from SWPPP
- B) Aerial Photo
- C) Photo Log

APPENDIX A



APPENDIX B

APPENDIX C

Imperial Marble Corporation

EPA Inspection 5/13/2014

All photos taken by Ben Atkinson, Enforcement Officer, U.S. EPA

Camera: OLYMPUS DIGITAL CAMERA



1: P1010240 Description: Mistake photo of parking area

Location: Parking area east of main plant.

Direction: NA

Date: 5/13/2014



2: P1010241 Description: Resin unloading area on the north end of the main plant.

Location: North end of property. Direction: Facing west. Date: 5/13/2014



3: P1010242 Description: Main plant

Location: North end of property

Direction: Facing south.

Date: 5/13/2014



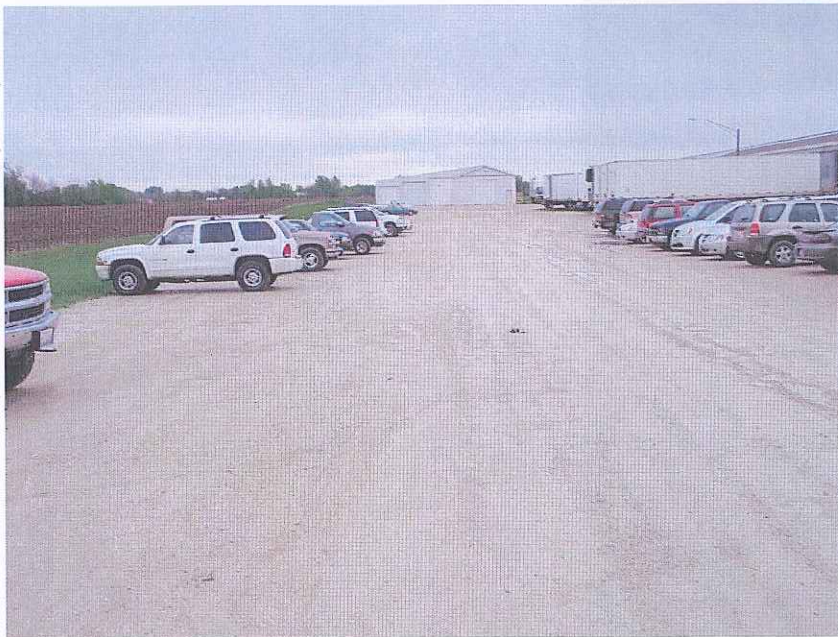
4: P1010243 Description: Entrance from East Lasalle Street.

Location: North end of property

Direction: Facing northeast. Date: 5/13/2014



5: P1010244 Description: North end of parking area.
 Location: North end of property. Direction: Facing east. Date: 5/13/2014



6: P1010245 Description: Parking area east of main plant. Out building in distance.
 Location: North end of parking area. Direction: Facing south. Date: 5/13/2014



7: P1010246 Description: Storm water drain in grassed area east of parking area.
Location: East of parking area. Direction: Facing south. Date: 5/13/2014



8: P1010247 Description: Storm water drain in grassed area east of parking area.
Location: East of parking area. Direction: Facing east. Date: 5/13/2014



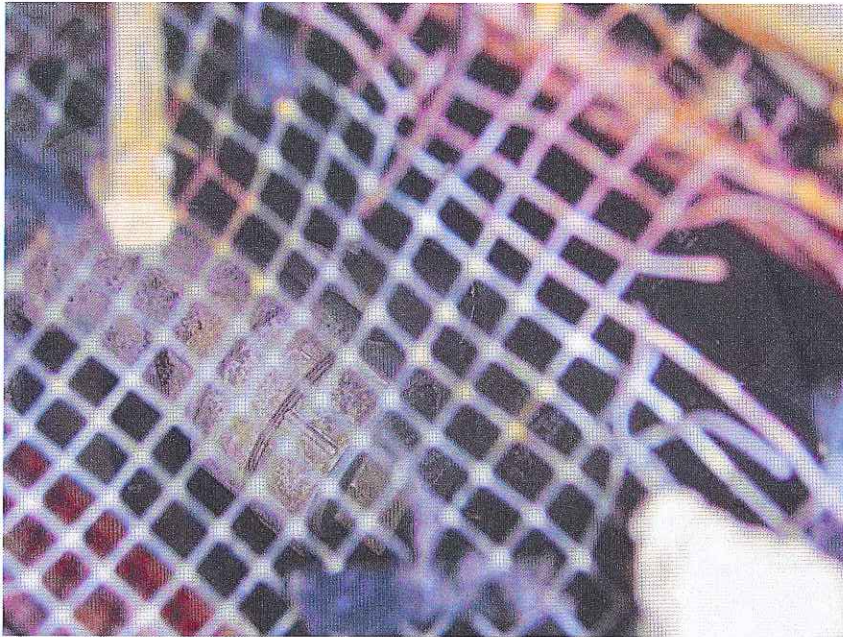
9: P1010248 Description: Down spout on east side of main plant.
Location: East side of main plant. Direction: Facing west. Date: 5/13/2014



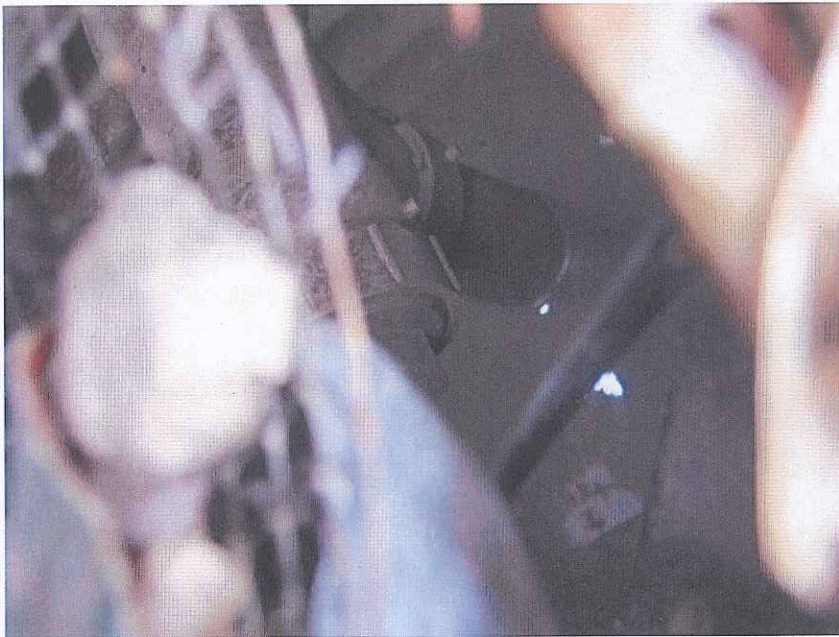
10: P1010249 Description: Storm water drain in east side loading dock.
Location: Loading dock on east side of main plant. Direction: Facing down.
Date: 5/13/2014



11: P1010250 Description: Storm water drain in east side loading dock.
Location: Loading dock on east side of main plant. Direction: Facing west.
Date: 5/13/2014



12: P1010251 Description: Interior of east loading dock storm drain.
Location: East loading dock. Direction: facing down. Date: 5/13/2014



13: P1010252 Description: Interior of east loading dock storm drain.
Location: East loading dock. Direction: facing down. Date: 5/13/2014



14: P1010253 Description: Contents of open topped dumpster east of main plant.
Location: East of main plant. Direction: NA Date: 5/13/2014



15: P1010254 Description: Contents of open topped dumpster east of main plant.
Location: East of main plant. Direction: NA Date: 5/13/2014



16: P1010255 Description: Grassed area east of parking area.
Location: East of main plant. Direction: Facing north. Date: 5/13/2014



17: P1010256 Description: Grassed area east of parking area. Out building in distance.
 Location: East of main plant. Direction: Facing South. Date: 5/13/2014



18: P1010257 Description: Outdoor storage area on south end of main plant.
 Location: Southeast corner of main plant. Direction: Facing west. Date: 5/13/2014



19: P1010258 Description: Storm water drain south of main plant.
Location: South of main plant. Direction: Facing down. Date: 5/13/2014



20: P1010259 Description: Mistake photo facing field south of main plant.
Location: South of main plant. Direction: South Date: 5/13/2014



21: P1010260 Description: Storm water drain south of main plant.
Location: South of main plant. Direction: Facing south.

Date: 5/13/2014



22: P1010261 Description: View from storm water drain south of main plant. Roll off dumpster with open barrels and out building in distance.

Location: South of main plant.

Direction: Facing Northeast. Date: 5/13/2014



23: P1010262 Description: Exterior storage area on south side of main plant.

Location: South of main plant by storm water drain. Direction: North

Date: 5/13/2014



24: P1010263 Description: View from storm water drain south of main plant. Roll off dumpster with open barrels and out building in distance.

Location: South of main plant.

Direction: Facing Northeast. Date: 5/13/2014



25: P1010264 Description: Roll off dumpster with empty barrels.
Location: West of out building. Direction: Northwest.

Date: 5/13/2014



26: P1010265 Description: Holes rusted through bottom of roll off dumpster.
Location: West of out building. Direction: NA

Date: 5/13/2014



27: P1010266 Description: Contents of roll off dumpster. Note open uncovered used barrels.
Location: West of out building. Direction: East. Date: 5/13/2014



28: P1010267 Description: Contents of roll off dumpster. Note open uncovered used barrels.
Location: West of out building. Direction: South. Date: 5/13/2014



29: P1010268 Description: Contents of roll off dumpster. Note open uncovered used barrels.
 Location: West of out building. Direction: South. Date: 5/13/2014



30: P1010269 Description: View from roll off dumpster towards south storm water drain.
 Location: West of out building. Direction: Southwest. Date: 5/13/2014



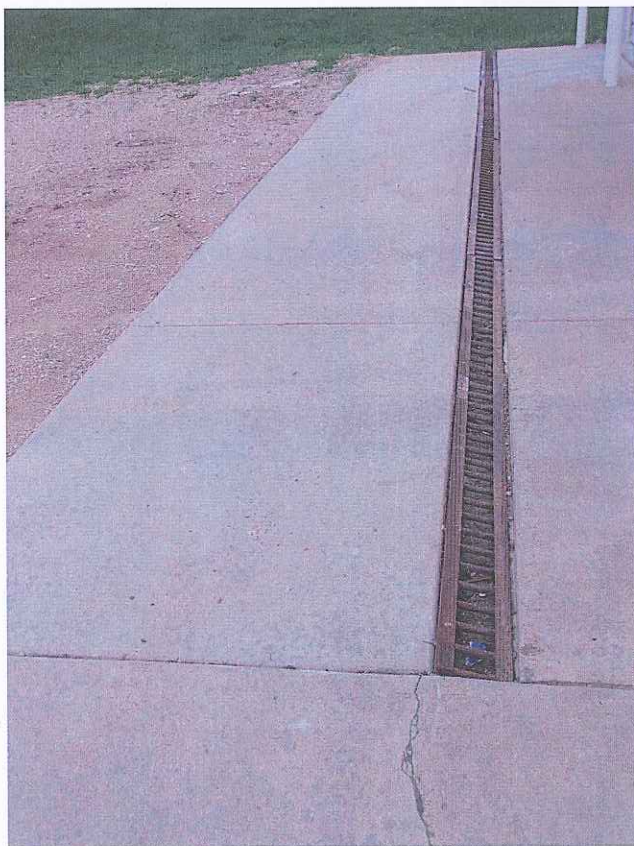
31: P1010270 Description: Storm water accumuliong around roll off dumpster
Location: West of out building. Direction: Northeast. Date: 5/13/2014



32: P1010271 Description: View from roll off dumpster towards south storm water drain.
Location: West of out building. Direction: Southwest. Date: 5/13/2014



33: P1010272 Description: Holes rusted through bottom of roll off dumpster.
 Location: West of out building. Direction: South. Date: 5/13/2014



34: P1010273 Description: Concrete pad on north end of out building.
 Location: Northwest corner of out building. Direction: East Date: 5/13/2014



35: P1010274 Description: Outdoor storage area on south side of main plant.
Location: Southwest corner of main plant. Direction: East. Date: 5/13/2014



36: P1010275 Description: Outdoor storage area on south side of main plant.
Location: Southwest corner of main plant. Direction: East. Date: 5/13/2014



37: P1010276 Description: Outdoor storage area on south side of main plant.
Location: Southwest corner of main plant. Direction: East. Date: 5/13/2014



38: P1010277 Description: West side loading dock. Grassed stormwater swale on the left.
Location: Southwest corner of main plant. Direction: Northwest. Date: 5/13/2014



39: P1010278 Description: Grassed storm water swale and storm water drain.
 Location: Southwest side of main plant. Direction: West Date: 5/13/2014



40: P1010279 Description: Mistake photo in grassed stom water swale on west side of main plant.
 Location: West of main plant. Direction: Down. Date: 5/13/2014



41: P1010280 Description: Storm water drain with gravel surrounding it.
Location: Southwest side of main plant in grassed swale. Direction: West

Date: 5/13/2014



42: P1010281 Description: Interior of storm water drain. Note presence of gravel from around drain in drain pipe. Location: Southwest side of main plant in grassed swale. Direction: Down.

Date: 5/13/2014



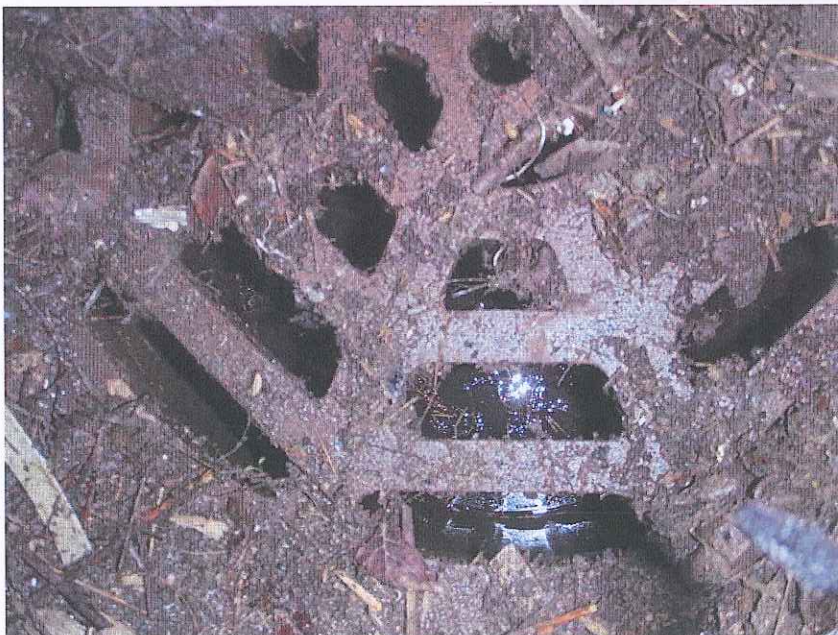
43: P1010282 Description: Grassed storm water swale on west side of main plant.
Location: Southwest of main plant. Direction: North. Date: 5/13/2014



44: P1010283 Description: Grassed storm water swale on west side of main plant.
Location: Southwest of main plant. Direction: South. Date: 5/13/2014



45: P1010284 Description: Storm water drain in west side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014



46: P1010285 Description: Storm water drain in west side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014



47: P1010286 Description: Storm water drain in west side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014



48: P1010287 Description: Storm water drain in west side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014



49: P1010288 Description: Interior of storm water drain in west side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014



50: P1010289 Description: Interior of storm water drain in west side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014



51: P1010290 Description: Interior of storm water drain in west side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014



52: P1010291 Description: West side loading dock.
Location: West side loading dock. Direction: Down. Date: 5/13/2014



53: P1010292 Description: Pile of discarded natural stone from time when IMC manufactured cut stone bath surfaces. Location: Southwest of main plant. Direction: South. Date: 5/13/2014



54: P1010293 Description: Outfall of storm water collection system. Location: East side of storm water retention pond. Direction: North. Date: 5/13/2014



55: P1010294 Description: Outfall of storm water collection system.
Location: East side of storm water retention pond. Direction: North. Date: 5/13/2014



56: P1010295 Description: Outfall of storm water collection system.
Location: East side of storm water retention pond. Direction: Northeast. Date: 5/13/2014



57: P1010296 Description: Storm water retention pond.

Location: East end of storm water retention pond. Direction: West.

Date: 5/13/2014



58: P1010297 Description: Outfall of storm water collection system.

Location: East side of storm water retention pond. Direction: South.

Date: 5/13/2014



59: P1010298 Description: Resin unloading area on north end of main plant.
Location: North end of main plant. Direction: Southeast Date: 5/14/2014



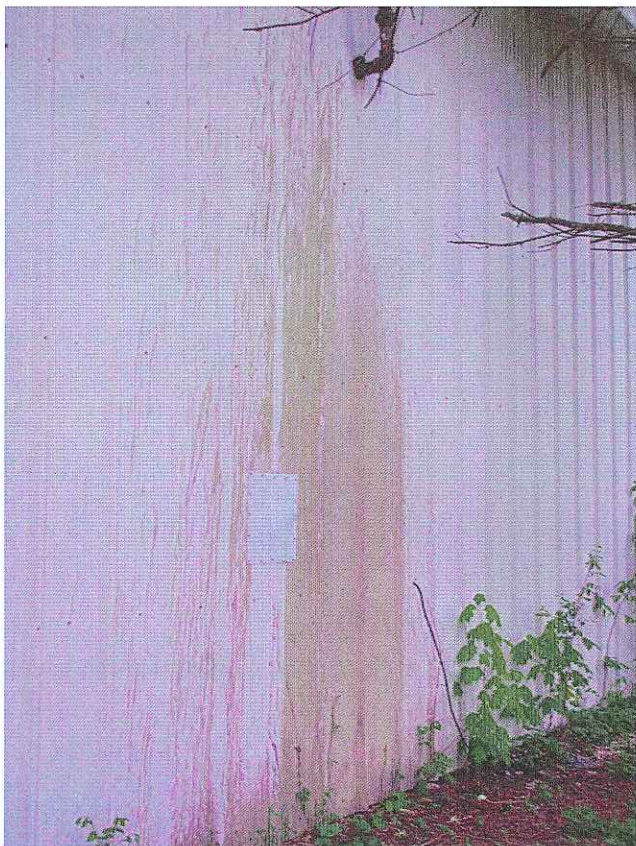
60: P1010299 Description: Resin unloading area on north end of main plant.
Location: North end of main plant. Direction: Southeast Date: 5/14/2014



61: P1010300 Description: Gate on north side of main plant to access areas on west side of main plant.
Location: Northwest corner of main plant. Direction: West. Date: 5/14/2014



62: P1010301 Description: Vent from resin storage area. Note substance on exterior wall. IMC representative stated that this was caused by an isolated back up a few years prior to date of inspection.
Location: Northwest side of main plant. Direction: South. Date: 5/14/2014



63: P1010302 Description: Vent from resin storage area. Note substance on exterior wall. IMC representative stated that this was caused by an isolated back up a few years prior to date of inspection.

Location: Northwest side of main plant. Direction: South. Date: 5/14/2014



64: P1010303 Description: Grass swale on west side of main plant.

Location: Northwest side of main plant. Direction: South. Date: 5/14/2014



65: P1010304 Description: Rusty holes and potential source of storm water contamination in dumpster.
Location: West of west loading dock. Direction: South. Date: 5/14/2014



66: P1010305 Description: Raw materials stored in out building. Note material on ground with potential to cause track out and storm water contamination.
Location: Out building. Direction: South.
Date: 5/14/2014



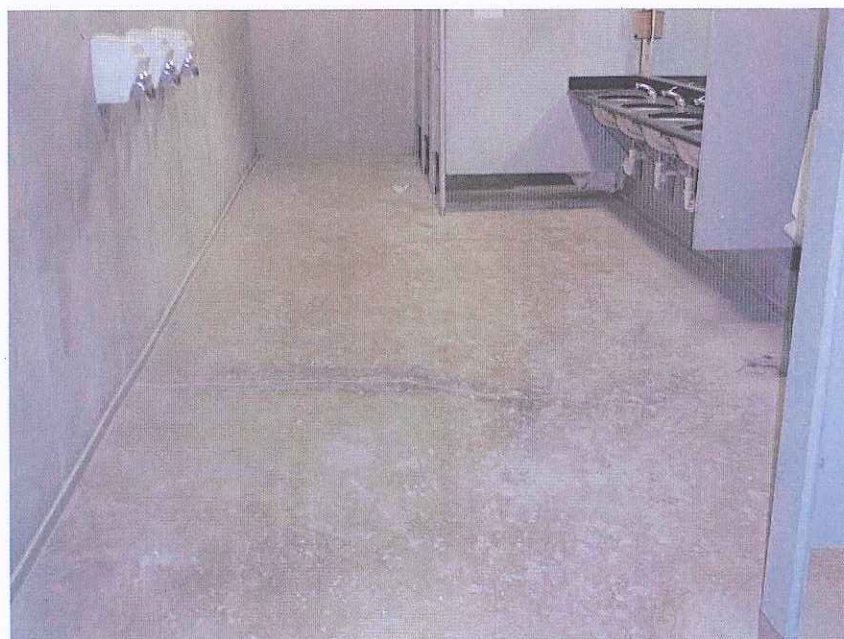
67: P1010306 Description: Raw materials stored in out building. Note material on ground with potential to cause track out and storm water contamination. Location: Out building. Direction: North.
Date: 5/14/2014



68: P1010307 Description: concrete pad on north side of out building. Note slight track out. Location: Northside of out building. Direction: South. Date: 5/14/2014



69: P1010308 Description: Hose from inside loading dock with water flowing out. IMC personel stated that water was from the fire sprinkler system. Location: East side loading dock. Direction: South.
Date: 5/14/2014



70: P1010309 Description: Only floor drain observed inside of IMC.
Location: Employee restroom. Direction: NA Date: 5/14/2014